

STATE BOARD OF EXAMINERS FOR SPEECH-LANGUAGE PATHOLOGY & AUDIOLOGY



Newsletter



Volume 15, No.1

Publication No. 76-10794

Spring/Summer 2000

PROPOSED RULE CHANGES AVAILABLE FOR COMMENT

Proposed Rule change language may be found on the Board Homepage:

www.tdh.state.tx.us/hcqs/plc/speech.htm. This is the opportunity for licensees, employers, consumers, and the public to comment on any of the rules being proposed. Comments on the proposal may be submitted to Ms. Dorothy Cawthon, State Board of Examiners for Speech-Language Pathology and Audiology, 1100 West 49th Street, Austin, TX 78756-3183.

The Board published a Notice of Intention to Review the sections as described in Rider 167 in the Texas Register on May 28, 1999. No comments were received during the 60-day comment period. The Government Code requires that each state agency review and consider for re-adoption each rule adopted by that agency pursuant to the Government Code, Chapter 2001 (Administrative Procedure Act).

The Act was codified by the 76th Texas Legislature as the Texas Occupations Code, Chapter 401, and this reference has been made throughout the rules. All references to other laws that were codified have been changed. Duplicative language that is currently in both the Texas Occupations Code and this chapter has been deleted throughout the sections and the Texas Occupations Code referenced. Also, language that the Texas Legislative Council deemed unnecessary during the codification process has been deleted from these sections. Throughout Chapter 741 some sections have catch lines and others do not; all catch lines are being deleted for consistency. The Board proposes a new Subchapter H relating to fitting and dispensing of hearing instruments and renumbered the following subchapters accordingly. Following are some changes you may wish to review:

SUBCHAPTER B, Section:

741.26 is being repealed and replaced with new **Section 741.14** to clarify the process to petition the board for a rule change and to require the submission of the economic cost associated with the petition for a rule change.

SUBCHAPTER C, Section:

741.31 is being amended to clarify assessment of language and speech and to require communication screening in the clients native language.

741.32 is being amended to extend the date for using 25dB HL for hearing screening; to require testing in both ears; to establish new hearing screening procedures effective 9/1/01, and use 25dB HL for pre-kindergarten and 20 dB HL for grades 1 through 12; to define hearing screening failures; and clarify follow-up procedures.

741.33 is being proposed to clarify that licensed speech-language pathologists, interns in speech-language pathology, and assistants in speech-language pathology may participate in universal newborn hearing screening.

SUBCHAPTER D, Section:

741.41 is being repealed and replaced with **new Section 741.41** concerning the Code of Ethics. The new section clarifies the record maintenance process, including language concerning providing false or misleading information on an application form, requires that and intern or assistant abide by the decision of the supervisor, requires submission of proof of need in order to supervise more than four interns and assistants, clarifies documentation concerning supervision, adds language relating to denial of renewal for failure to pay child support, and reorganizes and clarifies existing language.

Rules... Continued Page 3 >

**IMPORTANT ADDRESSES
AND PHONE NUMBERS**

BOARD OFFICE

Phone: (512) 834-6627

Fax: (512) 834-6677

E-mail:

speech@tdh.state.tx.us

Website:

www.tdh.state.tx.us/hcgs/plc/speech.htm

MAILING ADDRESS:

(Use this address for
correspondence that DOES NOT
include a fee.)

1100 West 49th Street
Austin, TX 78756-3183

**COMPTROLLER OF PUBLIC
ACCOUNTS - TREASURY
OPERATIONS**

(Use this address if
correspondence INCLUDES A
FEE and documentation)

State Board of Examiners
for Speech-Language
Pathology and Audiology
Texas Department of Health
P.O. Box 12197
Capitol Station
Austin, TX 78711-2197

PHYSICAL ADDRESS

8407 WALL STREET, S-420
AUSTIN, TX 78754

**CONSUMER COMPLAINT
INFORMATION**

PHONE: 1-800-942-5540

(Do not use this number to
contact the Board office.)

**P.O. BOX 141369
AUSTIN, TX 78714-1369**

**STATE BOARD OF EXAMINERS FOR SPEECH-
LANGUAGE PATHOLOGY & AUDIOLOGY**

Elsa Cardenas-Hagan, M.S.

(Presiding Officer)

Speech-Language Pathology
590 Rancho Escondido Drive
Olmito, TX 78575
Ph: (956) 504-2200
Fax: (956) 504-2231
valleyspeech@worldnet.att.net
Term Expires: 8/31/01

Judith (Judy) A. Chambers, M.Ed.

(Asst. Presiding Officer)

Public Member
2007 Papoose Trail
Crosby, TX 77532
Ph: (281) 540-5293
Fax: (281) 446-7025
judy.chambers@humble.k12.tx.us
Term Expires: 8/31/03

Bertha (Bert) M. Campbell, M.A.

Speech-Language Pathology
16434 Havenpark Drive
Houston, TX 77059
Ph: (281) 286-4994
Fax: (286) 461-8764
E-Mail: None
Term Expires: 8/31/05

Deborah (Deb) L. Carlson, PhD.

Audiologist
UTMB Center for Aud & Sp Path
Galveston, TX 77555-0525
Ph: (409) 772-2711
Fax: (409) 747-2185
dlcarlso@utmb.edu
Term Expires: 8/31/05

Harvey Komet, M.D.

Physician Member
8431 Fredericksburg Rd., Ste.170
San Antonio, TX 78229
Ph: (210) 616-0315
Fax: (210) 616-0310
H.Komet@humana.com
Term Expires: 8/31/01

Matthew H. Lyon, M.A.

Audiologist
810 N Kansas St
El Paso, TX 79902
Ph: (915) 532-6935
Fax: (915) 532-6289
MatthewHLyon@aol.com
Term Expires: 8/31/05

Lee Reeves, DVM

(Sec.-Treas.) Public Member
3207 Independence Parkway
Plano, TX 75075
Ph: (972) 596-3413
Fax: (972) 964-1152
Plreeves@flash.net
Term Expires: 8/31/03

Eric Reynolds, M.S.

Audiology
1001 Waldrop, Ste. 807
Arlington, TX 76012
Ph: (817) 461-3277
Fax: (817) 277-2803
hearhere@flash.net
Term Expires: 8/31/03

Sherry L. Sancibrian, M.A.

Speech-language pathology
5514 72nd Street
Lubbock, TX 79424
Ph: (806) 743-5660 x232
Fax: (806) 743-5670
SSLUBBOCK@aol.com
Term Expires: 8/31/05

----OFFICE STAFF----

Dorothy Cawthon
Executive Secretary
Lanell Brown
Licensing Supervisor
Marsha Lawson
Administrative Assistant
Johna Stowe
Compliance Technician
Lowell Schorr
Data Entry

The Texas Speech-Language Pathology & Audiology Newsletter is the official publication of the State Board of Examiners for Speech-Language Pathology and Audiology. Licensees must notify the Board Office of any address change. The Board is not responsible for lost, misdirected, or undeliverable correspondence, including forms and fees, if sent to the address last reported to the Board. Change in name, address or phone number must be submitted in writing.
Editor: Larry Higdon E-mail: Larry.Higdon@aol.com

Rules... Cont. from Page 1:

SUBCHAPTER E AND SUBCHAPTER F: (Parallel subchapters for the professions)

741.61 and 741.81 are being repealed and replaced with new sections of same number. Requires that the applicant pass the examination within two years of the end of the internship or repeat the experience; clarifies that course work earned before the baccalaureate degree is earned will not meet the graduate course work requirement; delete language relating to basic course work and specific areas in which clinical experience must be acquired since colleges and universities verify this information before granting a degree; and reorganizes existing language.

741.62 and 741.82 are being repealed and replaced with sections of identical numbers. Requires that coursework and clinical experience be completed within 10 years of the beginning of the internship; expands and clarifies segments, evaluation, maintenance of records, and changes in internship; allow the board and a university to designate specific individuals to assist them; and reorganize existing language.

741.65 and 741.85 are being repealed and replaced with identical numbered sections. Clarifies and expands the existing language concerning the clinical deficiency plan and requests to change direct or indirect supervision; increase the number of course work hours required in core curriculum that must be completed within 10 years of the date of application for the assistant license; identify course work that is not acceptable; delete language concerning course work earned from foreign universities; revise initial client contact; define part-time supervision; and allow an assistant to attend an admission, review, or dismissal without the presence of the supervisor under specific conditions.

741.86 is amended to state the holder of a temporary certificate of registration may not fit and dispense hearing instruments

SUBCHAPTER H, SECTION: (New Subchapter on Fitting and Dispensing Hearing Instruments)

741.101 clarify that an intern in audiology may only fit and dispense hearing instruments under supervision.

741.102 clarify and define the 30-day trial period for the return of a hearing instrument as 30 consecutive days.

SUBCHAPTER I, Section:

741.102 is being repealed and replaced with **new 741.111** to expand and clarify application submission procedures, reference time periods for processing, and reorganize existing language.

SUBCHAPTER J, Section:

741.122 and 741.123 replaced with **new 741.121** to rename the section and clarify that tests are administered separately, in speech-language pathology and in audiology, define the passing score, and identify who shall notify the applicant of the results of the examination.

SUBCHAPTER K, Section:

741.143 is being replaced by **new Section 741.142** to define how all licenses, certificates, and registrations, including holders of provisional licenses, limited licenses, and temporary certificates of registration, shall be displayed.

SUBCHAPTER L, Section: (New Subchapter L replaces Subchapter K which is being repealed)

741.161 replaces old **Section 741.162**; clarifies that the temporary certificate of registration and the provisional license cannot be renewed; clarifies the renewal process for intern and assistant licenses and registration to fit and dispense hearing instruments; defines how corrections are made on the renewal form; adds currently existing language to license concerning renewal of a limited license; maintenance of the record of continuing education hours form, and denial of a license for failure to pay child support.

741.162 replaces the old **Section 741.163**; decreases the maximum number of continuing education hours that may be accrued; expands on maintenance of continuing education and acceptable verification; states that continuing education hours may not be earned prior to the effective date of the license; requires prior board approval for continuing education in a related area; and identifies the passing examination score.

741.163 replaces the old **Section 741.164**; identifies the name of the board form and fee that shall be submitted; requires that the form be completed, signed, and dated; requires submission of the continuing education log; states that accrued continuing education hours must still be available for use at the time of reactivation; and prohibits a licensed audiologist or intern in audiology who has placed his or her license on inactive status to fit and dispense hearing instruments.

Rules... Continued Page 4 >

BOARD MEETING

Next Board Meeting: September 21 and 22. San Antonio, Texas. Contact Board Office for additional information.

741.164 replaces the old **Section 741.165**; requires the statement concerning the licensee's practice after expiration of the grace period be signed, states that a licensed audiologist or intern in audiology who has not renewed his or her license and registration prior to the end of the 60-day grace period may not fit and dispense hearing instruments, and requires submission of the continuing education log.

SUBCHAPTER M, Section: (Subchapter L is being repealed and replaced with Subchapter M)

741.181 (new) increases the fee for the temporary certificate of registration and the inactive fee; clarifies that all fees are nonrefundable and that dual licenses are two separate licenses; identifies the correct name for the inactive status fee and the provisional application and initial license fee; clarifies how the application and initial license fee, which have been combined, when there is a problem with funds received, i.e. checks are returned due to insufficient funds, payment stopped checks, etc.

SUBCHAPTER N, Sub-Section:

741.192 replace **Sub-Sections 741.193, 741.194 and 741.200** concerning procedures for filing a complaint and denying, suspending or revoking a license or registration.

741.193 replace **Sub-Sections 741.196, 741.197 and 741.199** concerning formal hearings and surrender of license or registration; to delete unnecessary language and identify the State Office of Administrative Hearings.

***Editor's note:** Answers to frequently asked questions (FAQ's), application packets and other forms, publications, and much more information related to licensure may be found on the Homepage.*

SHARS

Licensees or employers who have questions concerning SHARS may contact:

Ron Gernsbacher, Texas Department of Health Policy Initiatives at (512) 338-6509 or E-mail: rongernsbacher@tdh.state.tx.us

OR

Tommy Cowan, Texas Education Agency, Director of Interagency Coordination at (512) 463-9283 or E-mail: Tcowan@tmail.tea.state.tx.us

MESSAGE FROM THE PRESIDING OFFICER:

ELSA CARDENAS-HAGAN

The millennium is here and with it comes many changes to our Board. The first major news includes the addition of four new board members. The new members are **Sherry Sancibrian** (Lubbock), **Deborah (Deb) Carlson** (Galveston), **Bert Campbell** (Houston), and **Matthew Lyon** (El Paso). They have attended the new board member training and passed with flying colors! In fact, Deb Carlson has already attended her first Complaints Sub-committee meeting.

The addition of new board members also means that we must bid farewell to some extraordinary folks: **George Cire**, has moved to Colorado. He was our expert on continuing education issues, and brought knowledge and expertise in the area of audiology. He served as chair of the Audiology Scope of Practice Sub-committee. **Deloris Johnson's** six-year term expired. She served as chair of the Speech-Language Pathology Scope of Practice Sub-committee. She brought a wealth of experience, patience and knowledge to the Board, especially in issues related to school-based speech-language pathology. **Teri Mata-Pistokache**, from the Rio Grande Valley, served almost two complete terms. Teri is a former chair and vice chair of the Board and contributed expertise in the area of bilingual speech-language pathology, and with Jon Ashby, provided insight and direction regarding the needs of students and academic requirements. **Jon Ashby**, our outgoing chair, is a man who not only has knowledge of the history of a particular issue; he also possesses the vision of what the future could be for the professions. He is always very helpful and everyone on the board depended on him. Each of these individuals who have served their state and their profession in the past, present and future deserve a great big thank you! The best is yet to come with collaboration and teamwork. On behalf of the Board "Muchas Gracias!"

Continuing board members are: **Judith Chambers**, **Harvey Komet**, **Lee Reeves**, and **Eric Reynolds**. They will combine with the new members to continue offering the excellent service licensees have grown to expect from the Board.

DISCIPLINARY ACTIONS

License Suspended Adrienne Hedges Smith

On January 28, 2000 the State Board of Examiners suspended the license of Adrienne Hedges Smith (License No. 16289), speech-language pathologist, for violation of 22 Texas Administrative Code Sections 741.41(a)(1)(A)(v) and 741.41(a)(2)(B)(i), a licensee is required to maintain accurate records of professional services rendered and is prohibited from billing clients or third parties except for services actually rendered. Adrienne Hedges Smith's license is suspended for a twenty-four month period; the suspension probated over twenty-three months, with one (1) month of actual suspension, and that Ms. Hedges Smith be required to comply with the terms as specified in Section VI. Adrienne Hedges Smith shall be directly supervised by a person who is a Texas Licensed Speech-Language Pathologist during the probationary period. During the consultations the supervisor shall determine whether she has complied with the following requirements:

- a. practiced speech-language pathology only under supervision;
- b. billed or completed a speech therapy note only for services actually provided;
- c. notified her employer of her probationary status and provided her employer with a final copy of the settlement;
- d. performed no supervision of other speech-language pathologists, interns and assistants; and
- e. complied with continuing education and all other license renewal requirements.

REPRIMAND: Audiology Intern

A violation of Texas Occupations Code, Section 401.301 (Section 8(B), Article 4512J, V.T.S.C.),

Board Rules, 22 T.A.C., Section 741.82(Q) and (R) occurred and the Complaints Committee recommended that a letter of reprimand be issued and the Board agreed. Individual practiced without supervision after completion of the internship year and before license granted.

WARNING LETTERS & LETTERS OF AGREEMENT:

speech-language pathologists

Three warning letters were issued to licensees who continued to practice beyond the 60-day grace period.

Two letters of agreement issued for failure to provide proof of having earned required continuing education hours.

SLP "BEST PRACTICES" POLICY

The Board recommends that speech-language pathologists and interns in speech-language pathology utilize as a "best practices" policy, the "Utilization and Employment of Speech-Language Pathology Supportive Personnel With Underserved Populations" guideline developed by the American Speech-Language-Hearing Association Committee on Supportive Personnel. Adoption of this document should act as a "best practices" benchmark through which licensees may evaluate and improve their current practice.

PRAXIS – 2000 Contact Information

You may contact Praxis if you have a question regarding registration, scoring, or other Praxis services at: (609) 771-7395 or E-mail : praxis@ets.org

From a rotary phone, hold and you will be connected to a customer service representative, on duty Monday-Friday, 8am to 8pm EST.

NEW BOARD MEMBERS' COMMENT

SHERRY SANCIBRIAN

Speech-Language Pathologist
Lubbock, Texas

As a student in the 1970's, I heard discussion about failed attempts to gain state licensure, but I didn't understand why my mentors seemed to think achieving licensure was so important. Now, from the vantage point of a seasoned clinician and teacher, I understand why those stalwart leaders worked so hard to gain a legal identity for the professions and to have audiologists and speech-language pathologists recognized as independent providers. I sought to serve on the State Board of Examiners because I believe that licensure is an important safeguard that serves the dual purpose of protecting consumers and maintaining the integrity of the professions. Consumers are assured that someone who holds a license has at least the minimum preparation required, and as a practitioner, licensure assures me that anyone representing my profession meets certain academic and clinical standards.

There are so many issues that I think the Board may need to address during my tenure. With limited dollars available employers may seek to increase cost effectiveness by offering their own training programs, supplanting the currently accepted personnel preparation standards. Other providers may challenge the boundaries of our professions, at the same time as we may be seeking to expand our own scopes of practice. The advent of telehealth will generate questions about practicing across state lines and the need for multi-state licensure. Entry-level requirements are likely to change as audiologists pursue the clinical doctorate and speech-language pathologists consider increasing the clinical experience required. My goal as a member of the State Board is to address these and other challenges proactively, and do my best to meet the needs of the licensed professionals and the consumers we serve.

MATTHEW LYON

Audiologist
El Paso, Texas

I consider it an honor and privilege to have been appointed to the State Board of Examiners by Governor George W. Bush, and also view it as a great responsibility.

The members of this Board have a vital role in maintaining the integrity and legality of our professions. Maintaining and enforcing the rules set forth by law must be a priority to ensure a positive public view and ensuring the best possible service delivery. Promoting integrity and the highest quality service will benefit each of us regardless of our individual positions.

I am an audiologist working in a private practice setting. I have the opportunity to provide a complete range of diagnostic and rehabilitative services to all ages. My staff and I work in our offices, at hospitals, in public and private schools, and within other industries providing industrial audiology services. As a result, I am most familiar with the profit-oriented side of audiology. I have also worked as a college instructor and thus recognize the vital role of academia. I also believe that we should continue to expect our graduates to seek a higher level of knowledge and a higher standard of excellence than is mandated by current standards certifying an audiologist and business owner, I am particularly interested in current

Legislative issues at the state and national level. I am also concerned about the level of competence within the scope of practice for audiologists and have a desire to improve this.

Audiology is slowly moving toward an autonomous profession. I feel this will be the best situation for most audiologists; however, we need to ensure a smooth transition and continue a relationship with speech-language pathology.

I believe state licensure should be the credential that is recognized by insurance companies and governmental agencies. I also believe that state licensure should be stringent enough to ensure quality professionals and high quality service to the public. There are other areas that I feel we need to consider such as the sale of hearing aids over the Internet and disposable hearing aids. I am concerned about the relationship between audiologists, hearing aid dispensers, and physicians. Reimbursement issues for speech-language pathologists need to be closely monitored.

As a board member I intend to promote honesty, integrity, and high quality service to the public. If any licensee would like to discuss these or any other issues with me, or if I may be of service to you, please feel free to contact me.

CE Approved Sponsors in TEXAS

American Academy of Audiology
1735 N. Lynn St., Ste 950
Arlington, VA 22209-2022
(800) 222-2336 ext. 223
Kasey Goldberg

Resound Corporation
1025 Cordova Street
Dallas, TX 75223-1233
(800) 582-4327 ext. 5552

• **Callier Center for Communication Disorders**
1966 Inwood Road
Dallas 75235
(972) 883-3003
Linda Sensibaugh

Future Horizons
720 N. Fielder Road
Arlington, TX 76012
(800) 489-0727
Gail Moore

International Association for Orofacial Myology
5438 Alpha Road Dallas
75240 (472) 233-1312
Honor Franklin

Our Lady of the Lake Univ.
Dept. of Communication and Learning Disorders
411 SW 24th St.
San Antonio 78207-4666
(210) 434-6711
Mary Ann Acevedo

PRO-ED, Inc.
8700 Shoal Creek
Blvd. Austin, TX 78767
(512) 451-3246
Lynda Miller

• **Southwest Texas State Univ.**
Comm. Disorders Program
New Health Sciences Bldg.,
Room 310B
San Marcos 78666-4616
(512) 245-2330
Therese Whalen

• **Texas Speech-Language-Hearing Association**
4509 El Paso Ave.
Snyder, TX 79549
(915) 573-3183
Loretta Lee

• **University of Houston Speech Language-Hearing Clinic**
4800 Calhoun
Houston 77204-6611
(713) 743-2899
Mary R. Curl

• **University of North Texas**
Division of Comm. Disorders
PO Box 5008 Denton 76203
(940) 565-2262
Elizabeth Ohler

• **University of Texas at Austin**
Program in Comm. Disorders
Austin 78712-1089
(512) 471-4119
Rodger Dalston

• **Independent Study Sponsors Journal and/or Self Studies offered by 4 ASHA CE Sponsors:**

Augmentative Communication News
(Newsletter), Monterey, CA
(408) 649-3050
Sarah Blackstone

Seminars in Speech & Language & Seminars in Hearing
Denver, CO.
(303) 270-7856
Josefina de Guzman

Topics in Language Disorders
Rockville, MD
(301) 417-7500

Independent Study
Janice Stroud
9336 Springwater
Dallas, 75228
(214) 324-1773

Q & A

Q *Is manual lymph drainage within our speech-language pathology scope of practice?*

A The Board recently ruled that manual lymph drainage is NOT within our scope of practice. ASHA has no position on this practice. It is not a procedure that is traditionally taught within the curriculum of communicative sciences and disorders programs. It would not however, be unethical to perform this procedure with appropriate documented training as determined by the healthcare facility in which you are employed.

Q *How do I identify an assistant in a report or on their nametag? Can I use SLP-A?*

A An assistant must be clearly identified as an "assistant." Acronyms are not appropriate. The "SLP-A" could be misinterpreted as meaning a dually certified and licensed speech-language pathologist and audiologist.

Q *Can an ECI manager place your name on the child's IFSP grid, if you are not able to serve the child?*

A It is recommended that your name not be placed on the IFSP or any other document if you are not directly servicing the client.

Q *May an assistant in speech-language pathology collect data? May they document specific quantifiable data, e.g., a child making a verbal choice between two items three out of four times? Could this be documented on a progress note?*

A An assistant in speech-language pathology should be allowed to write quantifiable data in his/her therapy progress notes. The example given is acceptable. It is recommended that the progress note be co-signed by a licensed SLP.

Q *How accurate do I have to be with record maintenance for billing purposes?*

A Do not bill for services not provided; do not document services as provided when they were not provided; do not record inaccurate dates of services provided.

Send your questions to Newsletter Editor
State Board of Examiners for
Speech-Language Pathology & Audiology
Professional Licensing and Certification Division
1100 West 49th Street Austin, TX 78756-3183

CE Warning

Maintenance of continuing education (CE) hours is mandatory. The board is discovering that licensees may not have maintained their CE's from last year. If an audit is conducted it is for the current renewal and at least the past two renewals. This is necessary because of the 2- year roll- over. Licensees must submit the CE log and proof of the event. The two cited in the disciplinary letters of agreement above indicated on their last renewal form that "YES" they earned the CE hours but could not provide the board with proof when they were audited.

Board Rules (Section 741.162 and 741.163) require licensees to earn continuing education hours from an approved sponsor for yearly renewal. Licensees shall maintain the CE Log (Record of continuing education hour earned/used/available/dropped form.) and verification of each CE event for at least three renewal periods. Whether selected for audit or not requires maintenance of the log as follows:

- **Entering** the information required on the log by **transferring** information from the Final Listing of Continuing Education letter dated July 13, 1998 and **adding** CE's acquired since that time;
- Documenting CE's **"used"** for each year's renewal period;

- Documenting CE's **"dropped"** following each year's renewal period if the current date is beyond the "Available for Use Thru Date;" and
- Keeping **proof of each continuing education event** received from the approved sponsor.

When selected for audit, a licensee must submit a copy of the above information for the last three years. If a licensee is not selected for audit one year, it does not absolve him or her from these requirements for future years. A licensee who does not follow these requirements is subject to disciplinary action by the Board.

800 # FOR LICENSE RENEWALS

The Board office is in the process of obtaining a 1-800 number is being established to allow license renewals to be accomplished online. The licensee will be charged a small fee in addition to the renewal fee in order to renew by phone. Internet renewal capability is anticipated but will be in the future. The fee will be charged to the licensee's phone bill or credit card. CE's will still be required. Documentation will be required by written copy for licensee's being audited.

